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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF RACHEL BORRA IN
SUPPORT OF DEFENDANTS'
COMPLIANCE WITH SEPTEMBER 12,
2025, ORDER ON CROSS MOTIONS FOR
SUMMARY JUDGMENT**

1 I, Rachel Borra, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am the Chief Human Capital Officer for the U.S. Department of the Interior
3 (“Department”), headquartered in Washington, D.C. I have served in this position since
4 September 29, 2025. I make this declaration based on my own personal knowledge, on
5 information contained in the records of the Department, or on information provided to me by
6 Department employees.

7 2. In my role at the Department, I am responsible for personnel management. I have
8 the responsibility of overseeing the personnel enterprise and tracking and recording of personnel
9 actions, including terminations. I assist in ensuring that all personnel actions comply with federal
10 law, including those related to probationary and trial period appointees.

11 3. I have received and read the District Court’s September 12, 2025 Order on Cross
12 Motions for Summary Judgment (“September 25, 2025 Order”) in the above-referenced matter.

13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
14 and correct.

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16 Dated: October 30, 2025

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RACHEL BORRA
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